

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE
3 SOUTHERN DISTRICT OF INDIANA
4 RICHARD WATKINS,)
5 Plaintiff,)
6 -vs-) No. 2: 14-CV-35
7 TRANS UNION, LLC,)
8 Defendant)

<p>1 APPEARANCES:</p> <p>2 CENTO LAW LLC, By MR. G. JOHN CENTO (telephonically)</p> <p>3 334 North Senate Avenue Indianapolis, IN 46204</p> <p>4 (765) 280-FCRA cento@centolaw.com</p> <p>5 On behalf of the Plaintiff;</p> <p>6 SCHUCKIT & ASSOCIATES, PC, By MR. WILLIAM R. BROWN 4545 Northwestern Drive 8 Zionsville, IN 46077 (317) 363-2400 9 (317) 363-2257 (fax) wbrown@schuckitlaw.com</p> <p>10 On behalf of the Defendant.</p> <p>11 ALSO PRESENT: 12 Michael Prager, videographer</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 THE VIDEOGRAPHER: We are now on the record. 13:02</p> <p>2 Please, note that the microphones are sensitive and may 13:02</p> <p>3 pick up whispering and private conversations. 13:02</p> <p>4 Please, turn off all cell phones or place them 13:02</p> <p>5 away from the microphones as they can interfere with the 13:02</p> <p>6 deposition audio. Recording will continue until all 13:02</p> <p>7 parties agree to go off the record. 13:02</p> <p>8 My name is Michael Prager representing 13:02</p> <p>9 Veritext Legal Solutions. The date today is February 13:02</p> <p>10 11, 2015, and the time is approximately 1:00 p.m. This 13:02</p> <p>11 deposition is being held at Trans Union located at 13:02</p> <p>12 555 West Adams Street, Chicago, Illinois, 60661 and is 13:03</p> <p>13 being taken by counsel for the plaintiff. 13:03</p> <p>14 The caption of this case is Richard Watkins 13:03</p> <p>15 versus Trans Union, LLC. This case is being held in the 13:03</p> <p>16 United States District Court for the Southern District 13:03</p> <p>17 of Indiana, Case No. 14-CV-35. The name of the witness 13:03</p> <p>18 is Denise Norgle. 13:03</p> <p>19 At this time, the attorneys present in the 13:03</p> <p>20 room and everyone attending remotely will identify 13:03</p> <p>21 themselves and the parties they represent. 13:03</p> <p>22 MR. CENTO: John Cento for the plaintiff. 13:03</p> <p>23 MR. BROWN: William Brown, counsel for Trans 13:03</p> <p>24 Union. 13:03</p> <p>25 THE VIDEOGRAPHER: Our court reporter, Tracy 13:03</p> <p>Page 2</p> <p>Page 4</p>
<p>1 1 I N D E X 2 WITNESSES</p> <p>3 ALL WITNESSES: PAGE:</p> <p>4 DENISE NORGLE:</p> <p>5 Examination by MR. CENTO 5:8</p> <p>6 EXHIBITS</p> <p>7 NO EXHIBITS MARKED</p> <p>8 8</p> <p>9 9</p> <p>10 10</p> <p>11 11</p> <p>12 12</p> <p>13 13</p> <p>14 14</p> <p>15 15</p> <p>16 16</p> <p>17 17</p> <p>18 18</p> <p>19 19</p> <p>20 20</p> <p>21 21</p> <p>22 22</p> <p>23 23</p> <p>24 24</p> <p>25 25</p>	<p>1 Kerney, representing Veritext will swear in the witness 13:03</p> <p>2 and we can proceed. 13:03</p> <p>3 (Witness duly sworn.) 13:03</p> <p>4 DENISE NORGLE, 13:03</p> <p>5 called as a witness herein, having been first duly 13:03</p> <p>6 sworn, was examined and testified as follows: 13:03</p> <p>7 EXAMINATION 13:03</p> <p>8 BY MR. CENTO: 13:03</p> <p>9 Q. What did you do to prepare for today's 13:03</p> <p>10 deposition? 13:03</p> <p>11 A. I met with my counsel, Mr. Brown. 13:04</p> <p>12 Q. Did you have any other meeting besides the 13:04</p> <p>13 meeting with Mr. Brown? 13:04</p> <p>14 A. No, I don't believe so. 13:04</p> <p>15 Q. Did you review any documents? 13:04</p> <p>16 A. Yes, I did. 13:04</p> <p>17 Q. What did you review? 13:04</p> <p>18 A. I reviewed the court's order, and I reviewed 13:04</p> <p>19 affidavits I had previously executed in I think three 13:04</p> <p>20 matters. 13:04</p> <p>21 Q. Childress? 13:04</p> <p>22 A. I believe that's right. 13:04</p> <p>23 Q. Hobson? 13:04</p> <p>24 A. Yes. 13:04</p> <p>25 Q. What was the third? 13:04</p> <p>Page 3</p> <p>Page 5</p>

1 A. I believe it was this matter. 13:04	1 Mr. Dan Halvorsen, H-A-L-V-O-R-S-E-N; and Ms. Linda 13:07
2 Q. Did you review any other documents? 13:04	2 Dubnow, D-U-B-N-O-W. 13:07
3 A. No, I did not. 13:04	3 Q. What Trans Union employees are anticipated to 13:08
4 Q. How long was your meeting with Mr. Brown? 13:05	4 have relevant information about Mr. Watkins' claim? 13:08
5 A. I would estimate it was about two hours. 13:05	5 A. At this point, I would anticipate that the 13:08
6 Q. As of the date of filing of Mr. Watkins' 13:05	6 employees who would have information about this claim or 13:08
7 complaint, what members of Trans Union's legal staff 13:05	7 will be involved in the defense of this claim would 13:08
8 will be involved in the defense of the claims brought by 13:05	8 include associates from our Crumlin Consumer Relations 13:08
9 Mr. Watkins? 13:05	9 Office. That's C-R-U-M-L-I-N-N (sic) in Pennsylvania. 13:08
10 A. I'm sorry. I can't really hear the question. 13:05	10 So most likely, Liz Wilson in that office as well as 13:08
11 THE VIDEOGRAPHER: Let's turn up the speaker 13:05	11 possibly, Lynn Romanowski, R-O-M-A-N-O-W-S-K-I. 13:08
12 phone a little bit maybe without completely 13:05	12 Q. Anyone else? 13:09
13 disconnecting him. Here we go. 13:05	13 A. Not that I can think of at the moment. 13:09
14 Okay. I think it's at the maximum here, so 13:05	14 Q. Will Eileen Little be involved? 13:09
15 we'll if it's better. 13:05	15 A. Eileen Little, no. 13:09
16 BY MR. CENTO: 13:05	16 Q. Why won't she be involved? 13:09
17 Q. All right. As of the date of the filing of 13:05	17 A. She passed away a couple of years ago. 13:09
18 Mr. Watkins' complaint, what's members of Trans Union's 13:05	18 Q. Do you know when? 13:09
19 legal staff will be involved in the defense of this 13:06	19 A. I don't. 13:09
20 claim? 13:06	20 Q. Will Bill Stockdale be involved? 13:09
21 A. I'm sorry. As of -- are you asking as of the 13:06	21 A. I don't know whether we've made a 13:09
22 date of filing or as of today going forward? I don't 13:06	22 determination whether Bill Stockdale will be involved in 13:09
23 understand the question. 13:06	23 this case. 13:09
24 Q. The question was as of the date of filing. 13:06	24 Q. What about Steve Rieger? 13:10
25 A. I don't know the exact date of filing, so I 13:06	25 A. I don't anticipate that Steve Rieger will be 13:10
Page 6	
Page 8	
1 don't know if I can answer that question. 13:06	1 involved in this particular case. 13:10
2 Q. You said that in preparation for your 13:06	2 Q. Will the case involve any of the investigators 13:10
3 deposition today, you reviewed the order that was given 13:06	3 who processed the plaintiff's disputes? 13:10
4 in this case that authorized this deposition, right? 13:06	4 A. I don't know. 13:10
5 A. Yes, I did. 13:06	5 Q. There would be some investigators, right, who 13:10
6 Q. Did you read the subjects which -- the topics 13:06	6 processed the dispute? 13:10
7 which the Court authorized? 13:06	7 MR. BROWN: Object to form. 13:10
8 A. Yes, I did. 13:06	8 BY MR. CENTO: 13:10
9 Q. Okay. The first topic was, as of the date of 13:06	9 Q. Right? 13:10
10 filing of Mr. Watkins' complaint, what members of Trans 13:06	10 A. I'm sorry. Was there a question? 13:10
11 Union's legal staff will be involved in the defense of 13:06	11 Q. Yeah. 13:10
12 this claim? Did you read that when you reviewed the 13:06	12 MR. BROWN: Could the court reporter read that 13:10
13 order? 13:06	13 back, please. 13:10
14 A. Yes, I did. 13:06	14 MR. CENTO: That's okay. I can ask it again. 13:10
15 Q. Okay. But you don't know the answer to it? 13:07	15 MR. BROWN: Okay. 13:10
16 A. I know the members of the Trans Union's legal 13:07	16 BY MR. CENTO: 13:10
17 staff that are involved in the defense of this claim, 13:07	17 Q. My question was, again I'm asking about 13:11
18 but I did not make note of the date of filing of the 13:07	18 employees of Trans Union that are anticipated to have 13:11
19 claim, and I'm not sure exactly when this case was 13:07	19 relevant investigation about Mr. Watkins' claim. 13:11
20 filed. 13:07	20 Wouldn't the Trans Union employees who actually 13:11
21 Q. As of today, which members of the legal staff 13:07	21 processed plaintiff's disputes to Trans Union have 13:11
22 are involved? 13:07	22 relevant information about his -- about Mr. Watkins' 13:11
23 A. As of today, the members of the Trans Union's 13:07	23 claim? 13:11
24 legal staff involved in the defense of this case 13:07	24 A. So to the extent that Trans Union employees 13:11
25 are myself; Mr. John Blenke, that's B-L-E-N-K-E; 13:07	25 processed his disputes going back to I think 2007, those 13:11
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<p>1 records are captured in our Consumers Relations System. 13:11 2 I don't know that we would necessarily need to identify 13:11 3 the actual employees or whether they would be 13:11 4 participating in our defense of this case. 13:11 5 Q. Well, I'm not asking you -- okay. I'm not 13:11 6 asking if you might use them for your defense. I'm 13:12 7 asking if they would have relevant information. The 13:12 8 employees who processed assuming there was -- they were 13:12 9 employees of Trans Union who processed Mr. Watkins' 13:12 10 disputes would have relevant information about those 13:12 11 disputes. 13:12 12 MR. BROWN: Object to form. 13:12 13 THE WITNESS: Should I answer? 13:12 14 MR. BROWN: If you can. 13:12 15 THE WITNESS: I don't know that the 13:12 16 individuals who specifically processed Mr. Watkins' 13:12 17 disputes would remember processing his disputes. That 13:12 18 is why we capture everything in our consumer relations 13:12 19 system and that's why -- what Ms. Wilson would likely 13:12 20 refer to if she is involved in our defense of this 13:12 21 matter. 13:12 22 BY MR. CENTO: 13:12 23 Q. Well, plaintiff's counsel in these kinds of 13:12 24 cases will from time to time take the depositions of the 13:13 25 persons who had processed the disputes, right? 13:13</p>	<p>I conduct litigation activity simply because we have such 13:14 2 a longstanding relationship with this counsel, that they 13:14 3 know how we want the litigation conducted. 13:14 4 Q. And how do you want to conduct it? 13:15 5 MR. BROWN: Object to form, attorney-client 13:15 6 privilege. I'm going to instruct the witness not to 13:15 7 answer. 13:15 8 BY MR. CENTO: 13:15 9 Q. Has Trans Union provided to outside counsel 13:15 10 who handled claims like the claims in this case any 13:15 11 manuals related to the manner in which outside counsel 13:15 12 should conduct litigation activity? 13:15 13 A. I think the only manuals we provided to 13:15 14 outside counsel would fall under the category of 13:15 15 policies and procedures manuals or training manuals that 13:16 16 Trans Union uses that would be relevant to the defense 13:16 17 of this matter. I'm not sure if that's what you're 13:16 18 asking for. 13:16 19 Q. I'm asking about manuals related to the manner 13:16 20 in which outside counsel should conduct litigation 13:16 21 activities? 13:16 22 A. Well, I would view the manner in which they 13:16 23 conduct litigation activity to include the information 13:16 24 that they would rely on in defending Trans Union, but 13:16 25 I'm not sure what you mean by the manner in which we 13:16</p>
<p>Page 10</p> <p>1 MR. BROWN: Object to form. 13:13 2 If you know what plaintiff's counsel does 13:13 3 generally. 13:13 4 THE WITNESS: I think there are probably some 13:13 5 plaintiff counsels who would seek to take the deposition 13:13 6 of the individual operator who processed one of the 13:13 7 plaintiff's disputes. 13:13 8 BY MR. CENTO: 13:13 9 Q. Has Trans Union provided to outside counsel 13:13 10 who handled the plaintiff claims in this case any 13:13 11 written instructions related to the manner in which 13:13 12 outside counsel should conduct litigation activities? 13:13 13 MR. BROWN: Object to form and also object 13:14 14 that it's not the language that the Court used. 13:14 15 MR. CENTO: Go ahead. 13:14 16 THE WITNESS: So Trans Union's written -- I'm 13:14 17 sorry. Can I have the question again, please. 13:14 18 BY MR. CENTO: 13:14 19 Q. Sure. 13:14 20 Has Trans Union provided to outside counsel 13:14 21 who handles claims like the claims in this case any 13:14 22 written instructions related to the manner in which 13:14 23 outside counsel should conduct litigation activities? 13:14 24 A. No. I don't think we've given written 13:14 25 instruction as to the manner in which they should 13:14</p>	<p>Page 12</p> <p>1 would ask them to conduct litigation activity. 13:16 2 Q. That doesn't mean anything to you? You're not 13:16 3 sure about that, the manner in which outside counsel 13:16 4 should conduct litigation activity to you is not 13:17 5 something that you understand? 13:17 6 MR. BROWN: Object to form. 13:17 7 THE WITNESS: Well, I have an understanding of 13:17 8 it, but I'm not sure it's the same as your understanding 13:17 9 of it. 13:17 10 BY MR. CENTO: 13:17 11 Q. What's your understanding? 13:17 12 A. My understanding is that the manner of 13:17 13 conducting our defense would refer to looking at our 13:17 14 policies and procedures and training and system 13:17 15 documentation and using that information in our defense. 13:17 16 Q. What do all of those things have to do with 13:17 17 litigation activities? 13:17 18 MR. BROWN: Object to form, argumentative. 13:17 19 THE WITNESS: Well, the defense of the 13:17 20 litigation is what I would refer to as the litigation 13:17 21 activities. 13:17 22 BY MR. CENTO: 13:17 23 Q. And the manuals you're talking about, the 13:17 24 policies and procedures manuals which you're talking 13:17 25 about, they're Trans Union operating policies and 13:17</p>

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1 procedures, right? 13:17	1 break, after which the 13:20
2 MR. BROWN: Objection. Object to form. It 13:18	2 following proceedings were 13:20
3 doesn't correctly characterize the witness' earlier 13:18	3 had:) 13:20
4 testimony. 13:18	4 THE VIDEOGRAPHER: We are back on the record. 13:31
5 MR. CENTO: Go ahead. 13:18	5 The time is 1:29 p.m. Please, proceed. 13:31
6 THE WITNESS: I was referring to corporate 13:18	6 BY MR. CENTO: 13:31
7 policies and procedures, system documentation, training 13:18	7 Q. So you won't identify any manuals, but can 13:31
8 materials. I can't remember what else I said, but those 13:18	8 you -- can -- I still don't understand what these 13:31
9 are the things that we provide to our outside counsel to 13:18	9 manuals are about. What is -- what is the subject of 13:31
10 use in the defense of litigation against Trans Union. 13:18	10 these manuals? 13:31
11 BY MR. CENTO: 13:18	11 MR. BROWN: Object to form. I'm not sure 13:31
12 Q. Well, don't you provide those because they're 13:18	12 that's a question. 13:31
13 asked for in discovery? 13:18	13 BY MR. CENTO: 13:31
14 MR. BROWN: Object to form. 13:18	14 Q. Go ahead. 13:32
15 THE WITNESS: Not exclusively. 13:18	15 A. I believe the manuals to which I'm referring 13:32
16 BY MR. CENTO: 13:18	16 would be manuals pertaining to policies and procedures 13:32
17 Q. Okay. Are there some manuals that you provide 13:18	17 of Trans Union, system requirements or specifications 13:32
18 exclusively for the purpose you just -- you were just 13:18	18 for Trans Union and training materials for Trans Union. 13:32
19 describing that aren't produced because they're 13:18	19 Q. You said system requirements, and then what 13:32
20 requested in discovery? 13:18	20 was after that? 13:32
21 MR. BROWN: Object to form. 13:18	21 A. Training materials. 13:32
22 THE WITNESS: If I understand the question 13:19	22 Q. So policies and procedures for system 13:32
23 you're asking, the manuals and documents that we provide 13:19	23 requirements or is policies and procedures a separate 13:32
24 to our outside counsel to use in the defense of 13:19	24 category? 13:32
25 litigation encompasses much more than what is typically 13:19	25 MR. BROWN: Object to form. I'm going to 13:32
Page 14	Page 16
1 requested in discovery from case to case. 13:19	1 suggest that the court reporter read back the answer. 13:32
2 BY MR. CENTO: 13:19	2 MR. CENTO: No, no thank you. I don't need 13:32
3 Q. And -- and can you give me an example of a 13:19	3 the answer read back. You can have her read it back 13:32
4 manual that is more than that? 13:19	4 when -- if you ask your question. 13:32
5 MR. BROWN: Object to form. I'm going to 13:19	5 BY MR. CENTO: 13:32
6 instruct the witness not to -- not to answer. 13:19	6 Q. So my question was, you said policies and 13:32
7 MR. CENTO: You're -- you're asking her not 13:19	7 procedures, and then you said system requirements and 13:32
8 to -- you're telling her not to answer my question 13:19	8 these other things. Are you saying policies and 13:33
9 asking her to identify one of these manuals? 13:19	9 procedures about system requirements or is policies and 13:33
10 MR. BROWN: Correct. We're not going to be 13:19	10 procedures a separate thing? 13:33
11 talking about any specific documents here whether by way 13:19	11 A. I was referring to policies and procedures 13:33
12 of example or otherwise. 13:19	12 separately from the system requirements. 13:33
13 MR. CENTO: Okay. Let's -- I disagree. Let's 13:19	13 Q. Okay. So policies and procedures, system 13:33
14 see what the judge says. 13:20	14 requirements, training. Anything else? 13:33
15 MR. BROWN: Are we going to do that now? 13:20	15 A. Any system documentation. 13:33
16 MR. CENTO: Yeah. 13:20	16 Q. Anything else? 13:33
17 MR. BROWN: Let us know when you have the 13:20	17 A. That's all I can think of at the moment. 13:33
18 Court on the line. 13:20	18 Q. Okay. What -- what -- policies and procedures 13:33
19 MR. CENTO: As far as I'm concerned, we can go 13:20	19 about what? 13:33
20 off the record until -- until and when we get the Court 13:20	20 A. Trans Union has numerous policies and 13:33
21 on the line. 13:20	21 procedures pertaining to our compliance obligations 13:33
22 MR. BROWN: Agreed. 13:20	22 under the Fair Credit Reporting Act as well as policies 13:33
23 THE VIDEOGRAPHER: We're going off the record. 13:20	23 and procedures regarding operations. Those are probably 13:33
24 The time is 1:17 p.m. 13:20	24 the two primary categories I can think of that we would 13:34
25 (Whereupon there was a brief 13:20	25 provide to outside counsel for use in defense of 13:34
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1 litigation. 13:34	1 2:14-CV-135. Show that this matter is before 13:40
2 Q. And the compliance procedures, policies and 13:34	2 William Huffman, magistrate today, February 11th. It's 13:40
3 procedures that you talked about, are they the things 13:34	3 about 1:45. My understanding the parties are in the 13:40
4 that Trans Union should do in its operations to comply 13:34	4 middle of a deposition, and there is a question about 13:40
5 or are they specific about with outside litigation? 13:34	5 whether a particular question or series of questions 13:40
6 MR. BROWN: Object to form. If the witness 13:34	6 fall within some restrictions that the Court has 13:40
7 understands the question, she can answer. 13:34	7 proposed at document item 32, and that's my 13:40
8 THE WITNESS: I don't think the policies and 13:34	8 understanding, but I guess I'm not sure who -- who wants 13:40
9 procedures are written specifically with a view to 13:34	9 to carry the ball as to what I need to decide. 13:40
10 litigation. They are written more with a view to 13:34	10 John Cento, do you want to tell me from your 13:40
11 establish -- to determine what is required by the Fair 13:34	11 perspective what the -- what you think the issues are? 13:40
12 Credit Reporting Act, how Trans Union interprets those 13:34	12 MR. CENTO: Certainly, your Honor. If you 13:40
13 requirements and how our compliance with those 13:34	13 were to refer back to the order, Topic C was about 13:40
14 obligations and policies and procedures would avoid 13:35	14 written instructions or manuals related to the manner in 13:40
15 litigation. 13:35	15 which outside counsel conducts litigation activities 13:40
16 BY MR. CENTO: 13:35	16 that Trans Union has provided to its outside counsel. 13:40
17 Q. And operations, what are those policies and 13:35	17 So I asked that very question specific to whether they 13:40
18 procedures about? What about operations? 13:35	18 provided manuals, and the witness responded that they 13:40
19 A. So the policies and procedures that are 13:35	19 did provide manuals, and I asked the witness to identify 13:41
20 specific to different operations in the enterprise would 13:35	20 one of those manuals and was told no, and the witness 13:41
21 be more aimed to the mechanics of how to perform an 13:35	21 was instructed not to answer that question. 13:41
22 activity that's required or advisable under the Fair 13:35	22 THE COURT: Well, Brown, what would be your 13:41
23 Credit Reporting Act. 13:35	23 reason for finding that that did not fall within the 13:41
24 Q. Okay. Operations like handling a consumer's 13:35	24 scope of paragraph C? 13:41
25 dispute? 13:35	25 MR. BROWN: Your Honor, the Seventh Circuit 13:41
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	Page 20
1 A. That might be an example. 13:35	1 has made very clear that when examining these issues, 13:41
2 Q. Would another example be how to process 13:36	2 you can talk generally, but you can't examine about the 13:41
3 furnisher data? 13:36	3 proprietary information itself in -- in the course of 13:41
4 THE COURT REPORTER: What's the word in front 13:36	4 trying to determine whether or not the attorney was in 13:41
5 of data? 13:36	5 position to receive proprietary information. 13:41
6 THE WITNESS: Furnisher. 13:36	6 THE COURT: All right. But my understanding 13:41
7 I think there is some furnisher data 13:36	7 of the question is to identify the manuals, not to 13:41
8 processing documentation we have provided to outside 13:36	8 disclose their contents. It would be my understanding 13:42
9 counsel. That wasn't specifically what I was thinking 13:36	9 that one of the areas that we would have to deal with 13:42
10 of, but there probably are documents and policies around 13:36	10 here is whether manuals were provided in -- in 2005 or 13:42
11 that in the -- in the totality of what we have provided 13:36	11 before and whether there have been subsequent changes or 13:42
12 to outside counsel for defense purposes. 13:36	12 not to those manuals. I think my understanding of 13:42
13 MR. CENTO: I have the what I -- what I 13:36	13 paragraph C and the question asked is that the witness 13:42
14 believe is the judge calling on the other line. Could 13:36	14 would be required to describe or name or -- or delete. 13:42
15 you hold for just a second. 13:36	15 This is a manual that was given to counsel during the 13:42
16 Would you go off the record, please. 13:36	16 period of 2000X to 2000Y, and its title is X, and then 13:42
17 THE VIDEOGRAPHER: We are going off the 13:36	17 if the question was, have there been amendments to that 13:42
18 record. The time is 1:34 p.m. 13:37	18 document that have been provided to counsel between then 13:42
19 (Whereupon there was a brief 13:37	19 and now, the answer -- if the answer is no, then that's 13:42
20 break, after which the 13:37	20 one issue. If the answer is yes, then I would expect 13:42
21 following proceedings were 13:37	21 the witness to identify what is the nature, when -- was 13:42
22 had:) 13:37	22 the change made, what is -- what is the change made. It 13:43
23 (Whereupon a discussion was off 13:37	23 may not have to be a, you know, a determination at this 13:43
24 the video record.) 13:37	24 stage of whether the contents are there, but the 13:43
25 THE COURT: Let's show that this is cause 13:39	25 question is whether there has been a substantial change 13:43
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1 in instructions. 13:43	1 THE COURT: Yeah. Okay? So questions of that 13:45
2 So my understanding, Will, is that I would 13:43	2 nature is what I try to let you finish the deposition 13:46
3 overrule the objection to identifying the manuals in 13:43	3 on. I do not generally referee depositions question by 13:46
4 some manner, identifying what's their title, during what 13:43	4 question, and my problem is I have another conference 13:46
5 periods of time they were in effect, what periods of 13:43	5 coming up shortly that I won't be able to stay on this 13:46
6 time they changed, if any. Obviously, the question of 13:43	6 one very long with. So I think I'd like to see how you 13:46
7 what does manual A say and what does manual B say, I 13:43	7 guys will go forward in a good lawyerly manner and see 13:46
8 understand your objection to those cases -- those issues 13:43	8 if you can resolve it, but I will be around today, and I 13:46
9 might be well taken at least as being premature, but at 13:43	9 will be in and out of various conferences. So if you 13:46
10 this stage, I certainly would allow a definition of what 13:43	10 get stuck on another question, you can let me know. You 13:46
11 documents are out there to be answered as a part of the 13:43	11 need to call the area code (812) 434-6430 number to let 13:46
12 deposition. At least that was my intent in framing 13:44	12 us know that you've got a problem and then we would put 13:46
13 category C in that manner. 13:44	13 you back on this number to the extent we need to go on 13:46
14 MR. BROWN: Your -- your Honor, respectfully, 13:44	14 the record someplace. Okay? 13:46
15 it's Trans Union's position that the existence or 13:44	15 MR. BROWN: Understood, your Honor. 13:46
16 nonexistence of a specific manual identified by name 13:44	16 THE COURT: Okay. Great. All right. Well, 13:46
17 after the witness has already said that these are not 13:44	17 you guys good luck on that one and keep plowing away 13:47
18 exclusively manuals that are produced in discovery but 13:44	18 and -- and we'll go from there. Okay? 13:47
19 provided to outside counsel for purposes of defending 13:44	19 MR. BROWN: Thank you, sir. 13:47
20 litigation, that even identifying what exists and what 13:44	20 MR. CENTO: Thank you, your Honor. 13:47
21 doesn't and naming specific manuals would be outside the 13:44	21 THE COURT: Okay. Thanks. Sure. Bye-bye. 13:47
22 discovery permissible under the Seventh Circuit 13:44	22 MR. BROWN: John, I suggest that we take a 13:47
23 precedent. 13:44	23 break. 13:47
24 THE COURT: Well, you did not file an 13:44	24 MR. CENTO: I prefer not to. I'd like to have 13:47
25 objection within ten days of the Magistrate's order of 13:44	25 her answer -- find out if she's going to answer the 13:47
Page 22	Page 24
1 December 14th, did you? 13:44	1 question before you two walk out of the room. 13:47
2 MR. BROWN: I did not. 13:44	2 MR. BROWN: All right. Does the court 13:47
3 THE COURT: Okay. Then that's a matter 13:44	3 reporter want to read back the question or how do you 13:47
4 that you've -- you've not filed a timely objection. I'm 13:44	4 want to handle that? 13:47
5 going to overrule your objection. Now -- now, of course 13:44	5 MR. CENTO: I'll just ask the question again. 13:47
6 -- well, you can go ahead and order that person not to 13:44	6 So back on the record. 13:47
7 answer those questions and then they'll need to be 13:45	7 THE VIDEOGRAPHER: We are back on the record. 13:47
8 certified, and then if there's a further motion to 13:45	8 The time is 1:45 p.m. Please, proceed. 13:47
9 compel, I'll have to take under advisement whether at 13:45	9 BY MR. CENTO: 13:47
10 this stage I believe that that was an improper objection 13:45	10 Q. So you've been telling me about the manuals 13:47
11 and if it was, whether any sanctions have to be ordered 13:45	11 that are provided to outside counsel in response to a 13:48
12 by way of attorneys fees for the further motion to 13:45	12 question I asked you earlier paragraph C from the order 13:48
13 compel. 13:45	13 identify one of those manuals for me. 13:48
14 So I think that's where you are well at this 13:45	14 A. One of the manuals to which I was referring 13:48
15 stage is, you're too late to change the nature of the 13:45	15 probably isn't best categorized as a manual, but we 13:48
16 order. I'm interpreting the order -- my understanding 13:45	16 refer to it internally as the CRS Online Help 13:48
17 of the order that was given. You, obviously, can do 13:45	17 Documentation. 13:48
18 whatever you need to do to protect your client's 13:45	18 Q. Can you identify any other manuals other than 13:48
19 interest, but it is likely that I would find your 13:45	19 that? 13:48
20 objection to be not well taken and it is fairly likely 13:45	20 A. I believe another example of documentation we 13:48
21 that I would then issue some sort of costs with respect 13:45	21 provide to outside counsel is the online dispute 13:48
22 to a motion to compel, unless -- well, that's something 13:45	22 automation business requirements. 13:49
23 obviously, you have the right to do. 13:45	23 Q. Okay. Any others? 13:49
24 MR. BROWN: Yes, sir. I appreciate the 13:45	24 A. Another example I can think of would be -- I 13:49
25 Court's guidance. 13:45	25 don't know the correct title for it, but I would refer 13:49
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1 to it as our subject selection documentation. 13:49	1 automation business requirements. 14:00
2 Q. Any others? 13:49	2 Q. That's it. What's that about? 14:00
3 A. Well, we have several hundred compliance 13:49	3 A. Those would be the business rules that are 14:00
4 policies or SOPs. I don't know for sure which of those 13:49	4 used in the online dispute processing system we make 14:00
5 we would have provided to outside counsel. Some of 13:49	5 available for consumers to go online on the internet and 14:00
6 these would be provided, though, in connection with 13:49	6 make a dispute, and those rules are intended to 14:00
7 defense of a specific matter and others would be 13:49	7 replicate what an agent would do if the consumer either 14:00
8 provided just to get counsel's input on a draft 13:49	8 called in on our toll free number or wrote in to us with 14:01
9 document. 13:49	9 his dispute. 14:01
10 Q. Anything else? 13:49	10 Q. Is that document ever produced in litigation? 14:01
11 A. Nothing I can think of at the moment. 13:50	11 A. I don't know. But I do know it has been 14:01
12 MR. CENTO: We can take that break now. 13:50	12 reviewed with outside defense counsel. 14:01
13 MR. BROWN: Thank you. 13:50	13 Q. What about the subject selection 14:01
14 THE VIDEOGRAPHER: We are going off the 13:50	14 documentation? 14:01
15 record. The time is 1:47 p.m. 13:57	15 A. That again -- 14:01
16 (Whereupon there was a brief 13:57	16 Q. What's that about? 14:01
17 break, after which the 13:57	17 A. I'm sorry. 14:01
18 following proceedings were 13:57	18 Q. I just said what's that about? 14:01
19 had:) 13:57	19 A. That is the documentation of Trans Union's 14:01
20 THE VIDEOGRAPHER: We are back on the record. 13:58	20 proprietary matching logic that describes how we would 14:01
21 The time is 1:56 p.m., Please, proceed. 13:58	21 apply different matching routines to different inputs 14:01
22 BY MR. CENTO: 13:58	22 and data on the file to determine whether data matches 14:01
23 Q. What is the CRS Online Help Documentation 13:58	23 and should be added to the file of a consumer or to 14:01
24 about? 13:58	24 determine whether we should return a credit report when 14:01
25 MR. BROWN: Object to form and object to 13:58	25 one is requested. It's the area that Lynn Romanowski 14:02
Page 26	Page 28
1 outside the scope, but I'm going to allow the witness to 13:58	1 has been involved in. 14:02
2 answer. 13:58	2 Q. Is that document ever produced in litigation? 14:02
3 THE WITNESS: That's the documentation that 13:58	3 A. I guess just to clarify, I don't think it's 14:02
4 was initially created around the time the -- of the Fact 13:58	4 one documents. It's hundreds of documents documenting 14:02
5 Act amendments to the Fair Credit Reporting Act. So I 13:58	5 the different business rules, and I don't know for 14:02
6 want to say it was the 2002-2003 time frame, and that's 13:59	6 certain what portions of that have and have not been 14:02
7 all the documentation that's used to train consumer 13:59	7 produced. 14:02
8 relations operators. It includes resources for the 13:59	8 Q. But do you understand that some have been 14:02
9 operators to refer while they're processing a consumer's 13:59	9 produced? 14:02
10 request. It has system screen shots. It's a very 13:59	10 MR. BROWN: Object to form, mischaracterizes 14:02
11 voluminous set of documents, but that's what I was 13:59	11 the witness' earlier testimony. 14:02
12 referring to when I said the CRS Online Help Center. 13:59	12 BY MR. CENTO: 14:02
13 BY MR. CENTO: 13:59	13 Q. Go ahead. 14:02
14 Q. Is that document or parts of it ever produced 13:59	14 A. I would have -- I would only be guessing or 14:02
15 in litigation? 13:59	15 speculating. I don't know for certain whether any of 14:02
16 MR. BROWN: Excuse me? Object to form. The 13:59	16 that has been produced. 14:02
17 witness can answer, if she knows. 13:59	17 Q. When you mention hundreds of compliance 14:02
18 THE WITNESS: I don't know. 13:59	18 policies, any of those compliance policies -- would any 14:03
19 BY MR. CENTO: 13:59	19 of them contain information relevant to this case? 14:03
20 Q. Would the online dispute automation -- what 14:00	20 MR. BROWN: Object to form. The witness can 14:03
21 was that again? Online disputes? My notes are a little 14:00	21 answer, if she knows. 14:03
22 fuzzy. You said -- the second manual you identified -- 14:00	22 THE WITNESS: Yes. 14:03
23 you called it online disputes, consumer something 14:00	23 BY MR. CENTO: 14:03
24 business. Do you know which one I'm talking about? 14:00	24 Q. Okay. Which ones contain information relevant 14:03
25 A. I think I mentioned the online dispute 14:00	25 to this case? 14:03
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<p>1 A. I would imagine that the policies and 14:03 2 procedures that relate -- or the compliance policies 14:03 3 that relate to processing a consumer's dispute as 14:03 4 required by the Fair Credit Reporting Act within the 14:03 5 appropriate time frames with the communication of the 14:03 6 information as required by the Fair Credit Reporting 14:03 7 Act, I think those policies and procedures would be 14:03 8 relevant. 14:03</p> <p>9 Q. Anything else? 14:03</p> <p>10 A. There are probably some policies and 14:04 11 procedures that would be relevant to the Fair Credit 14:04 12 Reporting Act provisions regarding reasonable procedures 14:04 13 to assure maximum possible accuracy. I would imagine 14:04 14 some of those would be relevant. 14:04</p> <p>15 Q. Anything else? 14:04</p> <p>16 A. Nothing I can think of at the moment. 14:04</p> <p>17 Q. The policies and procedures that relate to the 14:04 18 processing consumer disputes you just mentioned, are 14:04 19 those ever produced in litigation? 14:04</p> <p>20 A. I don't know. 14:04</p> <p>21 Q. The policies and procedures that relate to 14:05 22 FCRA, the FCRA regarding reasonable procedures, are they 14:05 23 ever produced in litigation? 14:05</p> <p>24 A. I don't know. 14:05</p> <p>25 Q. So is the reason that you don't know why -- 14:05</p>	<p>1 represent us sometimes as local counsel in a particular 14:06 2 part of the country. 14:07</p> <p>3 Q. What firms are those? 14:07</p> <p>4 A. We used to use a firm in the Philadelphia area 14:07 5 that I don't believe exists anymore. You may recall 14:07 6 the -- the partner Mark Cogan and a lawyer named 14:07 7 Bruce Luckman who worked at that firm did some work for 14:07 8 us and Mr. Luckman still -- still works as outside 14:07 9 counsel for us on some matters. There's a firm in 14:07 10 California that acts as local counsel on certain 14:07 11 matters. A lawyer named Don Bradley. I don't recall 14:07 12 his firm's name, though. I don't recall who else. 14:07</p> <p>13 Q. All right. Can you think of any -- any other 14:08 14 manuals which you haven't told me about that would be 14:08 15 included in these group of manuals you give to outside 14:08 16 counsel that relate to the manner in which outside 14:08 17 counsel should conduct litigation activities? 14:08</p> <p>18 MR. BROWN: Object to form and object on the 14:08 19 basis that it mischaracterizes the witness' earlier 14:08 20 testimony. 14:08</p> <p>21 BY MR. CENTO: 14:08</p> <p>22 Q. Go ahead. 14:08</p> <p>23 A. So I can't think of anything specifically, but 14:08 24 I know that we are regularly -- sorry. Is that -- 14:08</p> <p>25 MR. BROWN: Are you still there, John? 14:08</p>
<p>Page 30</p> <p>1 whether or not these policies -- these manuals are ever 14:05 2 produced in litigation, is that because you don't 14:05 3 usually get involved in the discovery process in these 14:05 4 cases? 14:05</p> <p>5 MR. BROWN: Object to form. 14:05</p> <p>6 THE WITNESS: The reason I don't know what is 14:05 7 specifically produced is because we rely on the two or 14:05 8 three outside firms that we've used for the past 14:05 9 probably close to 20 years to handle the day-to-day 14:05 10 discovery. They don't have to check with us on every 14:06 11 single thing they do because we've had such a 14:06 12 longstanding relationship. 14:06</p> <p>13 BY MR. CENTO: 14:06</p> <p>14 Q. Who are the two or three outside firms 14:06 15 currently? 14:06</p> <p>16 A. Currently, the two primary firms we use is 14:06 17 Schuckit & Associates. And Strasburger & Price out of 14:06 18 Texas. 14:06</p> <p>19 Q. And who were they in 2005? 14:06</p> <p>20 A. The same firms, I believe. 14:06</p> <p>21 Q. The same two firms? 14:06</p> <p>22 A. Yes. 14:06</p> <p>23 Q. There weren't any other firms? 14:06</p> <p>24 A. They've always been a few other firms on 14:06 25 the -- on the defense team we use. And they still 14:06</p>	<p>Page 32</p> <p>1 MR. CENTO: Yeah, I'm here. 14:08</p> <p>2 MR. BROWN: We got a beeping on our end. 14:08</p> <p>3 MR. CENTO: Oh, I didn't hear. 14:08</p> <p>4 MR. BROWN: Sorry. Maybe that was feedback on 14:08 5 our phone. I'm sorry. I lost my train of thought. 14:09</p> <p>6 I can't think of any manual specifically, but 14:09</p> <p>7 I know that over the years, we have reviewed a lot of 14:09 8 our internal documentation with our litigation defense 14:09 9 counsel to get their feedback on mitigation strategies 14:09 10 and compliance strategies but I just -- at the moment I 14:09 11 can't think of any specific documents by name. 14:09</p> <p>12 BY MR. CENTO: 14:09</p> <p>13 Q. Okay. So the policies and procedures manuals, 14:09 14 the ones about compliance and the FCRA and the 14:09 15 operations that you told me about, did you give those to 14:09 16 outside counsel in 2005 or -- 14:10</p> <p>17 A. I think we have -- 14:10</p> <p>18 Q. Or before? 14:10</p> <p>19 A. I apologize I didn't catch the end of your 14:10 20 question. 14:10</p> <p>21 Q. Or before? 14:10</p> <p>22 A. I think parts of the consumer relations 14:10 23 documentation were definitely reviewed with defense 14:10 24 counsel prior to 2005. I think we elicited input on 14:10 25 that documentation when it was drafted. In fact, I 14:10</p>

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9 (Pages 30 - 33)

<p>1 think there are other policies and procedures documents 14:10 2 that we have reviewed with outside counsel prior to 14:10 3 2005. I don't know about the system documentation that 14:10 4 I mentioned regarding the online dispute automation. 14:10 5 That may have -- I don't recall when that was drafted. 14:10 6 Q What about the system requirements manuals, 14:11 7 are those provided to outside counsel prior to 2000 -- 14:11 8 2005 and before? 14:11 9 A. I think versions of the CRS system 14:11 10 documentation was provided to our defense counsel. I 14:11 11 think prior versions of the -- what's now called the 14:11 12 e-Oscar -- that's the letter E and the word "Oscar" -- 14:11 13 dispute processing documentation was probably provided 14:11 14 to outside counsel. So I think those system documents 14:11 15 or portions thereof would have been provided to outside 14:11 16 counsel at the time they were created. 14:12 17 Q. But between manuals -- 14:12 18 A. Consumer relations training is part of the 14:12 19 CRS online system. So, yes, portions of that would 14:12 20 definitely have been reviewed by outside counsel prior 14:12 21 to 2005. 14:12 22 Q. How about the system documentation? 14:12 23 A. I'm sorry. I didn't catch the question. 14:12 24 Q. What about the system documentation? 14:12 25 A. The CRS system documentation is also part of 14:12</p>	<p>1 THE WITNESS: I think system documentation is 14:14 2 updated to reflect updates to software or platforms. 14:14 3 So, for example, a screen shot might need to be updated 14:14 4 if the screen looks different as a result of a software 14:14 5 upgrade and in terms of compliance policies and 14:14 6 procedures, new policies and procedures are drafted and 14:14 7 added to the compendium to reflect new requirements 14:15 8 either arising from litigation or arising from changes 14:15 9 in law or industry practices that we observe. 14:15 10 Q. Okay. When in particular were the compliance 14:15 11 manuals revised to reflect updates in law? 14:15 12 A. So compliant -- the compliance policies and 14:15 13 procedures, again, we don't specifically put them in a 14:15 14 paper manual. They're maintained on an online basis, 14:15 15 and those are -- those policies are typically either 14:15 16 updated or new policies are written and added to the 14:15 17 online inventory of policies and procedures based on 14:15 18 changes to law. So, for example, when the Dodd-Frank 14:16 19 law passed, a lot of references in our documentation to 14:16 20 the Federal Trade Commission had to be updated to refer 14:16 21 to the CFPB. 14:16 22 Q. As you sit here today, do you know -- could 14:16 23 you identify and tell me each time that document is 14:16 24 updated? 14:16 25 A. No, I can't. 14:16</p>
<p>Page 34</p> <p>1 that CRS online document. So portions of that also 14:12 2 would have been provided to outside counsel prior to 14:12 3 2005. 14:12 4 Q. Of the portions of the CRS system 14:12 5 documentation that you say were provided to counsel 14:12 6 before 2005, have those changed? 14:13 7 MR. BROWN: Object to form. 14:13 8 THE WITNESS: So the system documentation that 14:13 9 was drafted at the time -- I'm sorry. The CRS online 14:13 10 help documentation that was drafted around the time of 14:13 11 the Fact Act is constantly being reviewed and 14:13 12 incremental updates are made to that documentation to 14:13 13 reflect changes in law or business practices, so -- or 14:13 14 to improve the wording to make it more easy for the 14:13 15 agents to understand it. We get feedback during the 14:13 16 training process that an agent might not understand 14:13 17 something. So it's redrafted to be more clear. So, 14:14 18 yes, there are updates to that documentation on an 14:14 19 ongoing basis. 14:14 20 Q. What about the compliance policies and 14:14 21 procedures and the operations policies and procedures, 14:14 22 you said some of them -- some of those manuals were 14:14 23 given to outside counsel before 2005. Had those changed 14:14 24 since 2005? 14:14 25 MR. BROWN: Object to form. 14:14</p>	<p>Page 36</p> <p>1 Q. Is it like the other manuals that we were just 14:16 2 talking about, updated on an ongoing basis? 14:16 3 A. The compliance policies and procedures? 14:16 4 Q. Yes. 14:16 5 A. Well, there was a big update effort to change 14:16 6 the references from the FTC to the CFPB when Dodd-Frank 14:16 7 passed, but other than that, those rarely get updated. 14:17 8 Typically maybe just a new policy would be added to the 14:17 9 inventory of policies. 14:17 10 So, for example, a new State law passes that 14:17 11 changes the price of a security freeze for a consumer. 14:17 12 A new policy would be published to reflect that. Or the 14:17 13 CFPB changes the price that we can charge a consumer for 14:17 14 a disclosure. A policy would be updated to reflect 14:17 15 that, but the core of the policies and procedures, 14:17 16 we've -- we've never gone and done a rewrite of those. 14:17 17 That's remained pretty consistent. 14:17 18 Q. When was the Dodd-Frank related update made? 14:17 19 A. I think Dodd-Frank passed in 2010, and the 14:17 20 CFPB was -- or began operations in 2011. So I think 14:17 21 that we made a number of updates in the late 2010, early 14:18 22 2011 time frame to reflect that the CFPB was now going 14:18 23 to receive certain reports and information that 14:18 24 previously the Federal Trade Commission had received. 14:18 25 Q. In 2012, the CFPB issued a supervision and 14:18</p>

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<p>1 examination manual. Are you familiar with that? 14:18 2 A. Yes, I am. 14:18 3 Q. The policies and procedures that we're talking 14:18 4 about updated to reflect the supervision and examination 14:18 5 manual as issued by the CFPB? 14:18 6 A. I don't think -- sorry. Let me rephrase that. 14:18 7 Trans Union did create some new policies and procedures. 14:18 8 For example, regarding third-party oversight in response 14:18 9 to the CFPB supervision and examination manual. I don't 14:18 10 know if those particular policies and procedures were 14:18 11 ever reviewed with outside counsel because I don't think 14:19 12 they're particularly relevant to litigation, but I'm not 14:19 13 completely certain of that. 14:19 14 Q. How do these updates get to outside counsel? 14:19 15 A. It can get to outside counsel in a number of 14:19 16 ways. So we have -- as long as I can remember had an I 14:19 17 want to say annual, but we might have missed a year here 14:19 18 or there summit with our primary defense counsel where 14:19 19 they've come in either to our Chicago headquarters or to 14:19 20 one of our consumer assistant centers for a couple day 14:19 21 meeting to talk about strategy, to talk about policies 14:19 22 and procedures, to talk about what kind of claims we're 14:19 23 seeing where they would make suggestions to us to 14:19 24 mitigate risk, and in those summit meetings, we would 14:20 25 typically review either recent updates or proposed 14:20</p>	<p>1 they're an online based document. They're not written 14:22 2 in a manual. How do the outside counsel see an online 14:22 3 based document, if it's not written in a manual? 14:22 4 MR. BROWN: Object to form and also object 14:22 5 that it mischaracterize the witness' prior testimony. 14:22 6 BY MR. CENTO: 14:22 7 Q. Go ahead. 14:22 8 A. So many of the documents I refer to are 14:22 9 maintained electronically. So either a screen shot of 14:22 10 the document or we can make a PDF of the documents and 14:22 11 send those electronically to outside counsel. And then, 14:22 12 again, when outside counsel is working in our premises 14:22 13 with our witnesses or employees in defending a case, 14:22 14 they've got access to our online -- our online 14:22 15 documentation right along with the Trans Union employee. 14:22 16 We also share some -- some documents 14:22 17 through -- I don't know the name of the litigation 14:22 18 systems we're using write now, but I know there's been a 14:22 19 way to share documents through an online internet 14:23 20 based -- or web-based software, but we've changed the 14:23 21 platforms we've used over the years for how we share 14:23 22 those documents. 14:23 23 Q. These compliance manuals that you're talking 14:23 24 about, are any of them relevant to the claims brought by 14:23 25 Mr. Watkins in this case? 14:23</p>
<p>Page 38</p> <p>1 updates with our outside counsel to get their feedback. 14:20 2 That's one way. 14:20 3 Another way we would convey updates would be 14:20 4 after we publish an update or publish a new policy, we 14:20 5 would typically send it to outside counsel, particularly 14:20 6 if we thought it was relevant to, you know, defense 14:20 7 strategy or defending a particular group of cases that 14:20 8 they're handling for us. And then I think, 14:20 9 periodically, when our outside counsel have brought on 14:20 10 new associates, we've -- we've done some specific 14:20 11 training and review of policies and procedures with the 14:20 12 lawyers at the firm just to make sure everybody is up to 14:20 13 date on what documentation we have and what resources 14:20 14 are available to the firm in the defense of our 14:21 15 litigation. 14:21 16 Q. And how long have you been following that 14:21 17 practice, since before or after 2005? 14:21 18 MR. BROWN: Object to form. 14:21 19 THE WITNESS: I believe we've been having the 14:21 20 summits going back into the 1990. Certainly since I can 14:21 21 remember those types of meetings and then I think we've 14:21 22 been sending documents and updates and having reviews I 14:21 23 think going back at least to the year 2000. 14:21 24 BY 14:21 25 Q. You said that the compliance documents are -- 14:21</p>	<p>Page 40</p> <p>1 MR. BROWN: Object to form. 14:23 2 THE WITNESS: Well, I think that -- I'm not 14:23 3 sure how this question is different than the one we 14:23 4 talked about before, but I think the policies around 14:23 5 dispute handling and the requirements, the Fair Credit 14:23 6 Reporting Act and probably the policies around 14:23 7 reasonable procedures to ensure maximum possible 14:23 8 accuracy, those policies are relevant to pretty much 14:23 9 every lawsuit that's filed against Trans Union. 14:23 10 Q. I was actually -- I know I asked you that 14:23 11 question about the dispute handling policies, but I was 14:24 12 actually hoping you would focus on these online 14:24 13 compliance manuals. What's in there that's relevant to 14:24 14 any of the claims in this case? 14:24 15 MR. BROWN: Object to form. 14:24 16 THE WITNESS: I believe there's a policy, a 14:24 17 compliance policy, document that relates to the dispute 14:24 18 obligations in the Fair Credit Reporting Act with 14:24 19 respect to timing, so -- or determining whether a 14:24 20 dispute is frivolous or determining how many days we 14:24 21 have to open an investigation, how many days we have to 14:24 22 respond to the consumer. Those types of requirements 14:24 23 from the Fair Credit Reporting Act is documented in 14:24 24 compliance policies. Is that -- is that what you were 14:24 25 asking about? 14:25</p>

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<p>1 Q. Sure. 14:25 2 Any others that you can think of? 14:25 3 A. With respect to dispute handling, I can't 14:25 4 think of anything at the moment. 14:25 5 Q. Not with respect to dispute handling. My 14:25 6 question is about these online compliance manuals that 14:25 7 you've been telling me about. 14:25 8 A. So -- 14:25 9 Q. Anything -- anything else in there that you 14:25 10 think is relevant to this lawsuit? 14:25 11 MR. BROWN: Object to form. 14:25 12 THE WITNESS: Well, for example, our 14:25 13 compliance department issues policies on how data 14:25 14 furnishers should be vetted and that potentially is 14:25 15 indirectly relevant to the investigation we conduct with 14:25 16 a data furnisher on information that's disputed. I'm 14:25 17 not sure whether that's specifically relevant to this 14:26 18 lawsuit. There are also policies around how long data 14:26 19 is retained on the database. There are policies around 14:26 20 what consumer identification is required to make a 14:26 21 disclosure. I -- I just haven't dived deeply enough 14:26 22 into the facts of this case to determine which of the 14:26 23 policies and procedures would be relevant to the defense 14:26 24 of this particular matter, but, again, we have a core 14:26 25 set of policies and procedures that are -- are generally 14:26</p>	<p>Page 42</p> <p>1 an update because the screen shots had to change so that 14:29 2 the furnisher would know that there was an associated 14:29 3 image available that related to the disputes and they 14:29 4 would be able to link over to that image while they were 14:29 5 investigating the dispute that we had sent to the 14:29 6 furnisher. So, yes, that's an example of a change 14:29 7 because the screen shots -- the screens have changed for 14:29 8 the users. So the screen shots in the documentation 14:29 9 needed to be updated. 14:29 10 Q. In an effort to convey, it's more than just 14:29 11 the screens, right, the actual -- this was a pretty big 14:29 12 change, right, being able to add images to disputes? 14:29 13 MR. BROWN: Object to form, argumentative. 14:30 14 THE WITNESS: Well, I guess in terms of 14:30 15 magnitude of change, I think some -- we didn't view it 14:30 16 as a huge change in terms of what our agents do because 14:30 17 our agents would already categorize the consumer's 14:30 18 dispute and summarize it in a free-form text field, and 14:30 19 a lot of the documents don't have any material 14:30 20 incremental value to that process, but in terms of what 14:30 21 a data furnisher does, it was a fairly big change for 14:30 22 them to have to view the documents that we were 14:30 23 forwarding on and just confirm that there was nothing in 14:30 24 there that would change the outcome of the dispute, but 14:30 25 from the Trans Union side, it was not that big of a 14:30</p>
<p>1 relevant to our litigation defense. 14:26 2 BY MR. CENTO: 14:26 3 Q. Any others that you can think of? 14:26 4 A. No, I can't think of anything else right now. 14:26 5 Q. Dispute processing documents, how often do 14:27 6 they change? 14:27 7 A. Well, the e-Oscar system that we use to convey 14:27 8 a dispute to a data furnisher is updated I would guess a 14:27 9 couple times a year. A new code might be added that 14:27 10 could be used in that system or a definition to a code 14:28 11 might be changed. So those types of updates will happen 14:28 12 maybe a couple times a year, and then, again, the screen 14:28 13 shots that a data furnisher sees when they are accessing 14:28 14 a dispute can be updated when there's a software update. 14:28 15 So the documentation -- the training documentation that 14:28 16 Trans Union would use and our furnishers would use and 14:28 17 what we would share with our defense counsel, those 14:28 18 things get updated to reflect those types of changes, I 14:28 19 would estimate a couple times a year. 14:28 20 Q. So the e-Oscar dispute processing manuals was 14:28 21 updated when e-Oscar began implementing the change in 14:28 22 the e-Oscar system that allows for consumer reporting 14:28 23 agencies to attach PDF documents to the dispute? 14:29 24 MR. BROWN: Object to form. 14:29 25 THE WITNESS: Yes. That's a good example of 14:29</p>	<p>Page 43</p> <p>1 change. 14:30 2 BY MR. CENTO: 14:30 3 Q. And the change is related to images that 14:30 4 happened in what, 2013? 14:31 5 MR. BROWN: Object to form. 14:31 6 THE WITNESS: I do believe the linking and 14:31 7 image enhancement went live in August of 2013. 14:31 8 BY MR. CENTO: 14:31 9 Q. Have the CRS online -- I'm sorry. Was the CRS 14:31 10 online help documentation given to outside counsel prior 14:31 11 to 2005? 14:31 12 A. I know portions of it were given to outside 14:31 13 counsel prior to 2005. 14:31 14 Q. Which portion? 14:31 15 A. Probably the portions relating to dispute 14:31 16 handling and training of our dispute operators. I don't 14:32 17 know if the portions pertaining to disclosures would 14:32 18 have been shared with outside counsel because that's not 14:32 19 an area we get a lot of litigation about. I'm trying to 14:32 20 think what else? Probably most of the sections to 14:32 21 dispute handling would have been shared with outside 14:32 22 counsel prior to 2005. Probably at the time it was 14:32 23 drafted. 14:32 24 Q. And -- and when you -- when you say 14:32 25 disclosures, you're talking about when a consumer 14:32</p>

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1 requests a copy of their credit file? 14:32	1 requirements, are those -- were those manuals provided 14:36
2 A. Yes, that's correct. 14:32	2 to outside counsel prior to 2005? 14:36
3 Q. Any -- any other portions that you can think 14:32	3 A. I don't know. I don't remember when -- when 14:36
4 of that would have been shared with outside counsel 14:32	4 Trans Union instituted the online dispute automation 14:37
5 prior to 2005? 14:32	5 system. 14:37
6 A. I don't know whether the portions relating to 14:32	6 Q. The subject selection documentation, were 14:37
7 quality assurance would have been shared. I do believe 14:32	7 those manuals provided to outside counsel prior to 2005? 14:37
8 the sample -- I'm sorry. The templates we use for 14:33	8 A. I'm quite certain that some of the subject 14:37
9 letters to consumers have been shared with outside 14:33	9 selection documentation was provided to outside counsel 14:37
10 counsel and certainly would have been shared prior to 14:33	10 prior to 2005. 14:37
11 2005 because some of the wording of those letters was 14:33	11 Q. And which -- which ones? 14:37
12 the subject of litigation. 14:33	12 A. Well, subject selection documentation goes to 14:37
13 Q. Anything else? 14:33	13 thousands of pages because there's a document that 14:37
14 A. I can't think of what else we might have 14:33	14 describes potentially every scenario you can imagine 14:37
15 shared. 14:33	15 with different combinations of consumers' identification 14:37
16 Q. As far as the dispute handling, the portion of 14:33	16 and different rules we have to recognize, for example, a 14:37
17 the CRS online help documentation that was shared with 14:33	17 nickname. So those -- those types of -- those -- 14:37
18 outside counsel prior to 2005, have those documents 14:33	18 different documents about the different rules have -- 14:38
19 changed since? 14:33	19 have been provided to outside counsel in connection with 14:38
20 A. Well, I'm certain there were some changes to 14:33	20 evaluating what's happened in a particular consumer 14:38
21 those documents because as I mentioned, the sample 14:33	21 scenario and how are rules worked to help outside 14:38
22 letters that might go to a consumer in connection with 14:33	22 counsel defend what we've done with a particular's 14:38
23 communicating with the consumer about their dispute, 14:34	23 consumer file. Those would definitely be reviewed prior 14:38
24 that would certainly -- updates are made to those 14:34	24 to 2005. 14:38
25 periodically to make the language more consumer friendly 14:34	25 Q. Any of the manuals that you're referring to 14:38
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1 or more clear. 14:34	1 now manuals that would be relevant to any of the claims 14:38
2 I think the dispute claim codes that are 14:34	2 in this case? 14:38
3 available for a Trans Union agent to use in conveying a 14:34	3 MR. BROWN: Object to form. 14:38
4 dispute have -- new codes have been added over the 14:34	4 THE WITNESS: I absolutely think some of Trans 14:38
5 years, so that's a change to the documentation. Trans 14:34	5 Union's subject selection rules would be relevant to 14:38
6 Union periodically changes business rules on how we 14:34	6 this claim. 14:38
7 14:34	7 BY MR. CENTO: 14:38
8 14:34	8 Q. Okay. Can you identify a manual that would be 14:38
9 REDACTED 14:34	9 relevant by name? 14:38
10 14:34	10 A. So just to make sure I understand the 14:38
11 14:35	11 question, I think there is going to be subject selection 14:38
12 REDACTED 14:35	12 documentation that would be relevant that would describe 14:39
13 14:35	13 the rules that were evoked with this plaintiff's credit 14:39
14 REDACTED 14:35	14 file to match data to his file. Again, it's not a 14:39
15 14:35	15 manual. It's the documentation of all of the business 14:39
16 14:35	16 rules that are used. I would imagine that the dispute 14:39
17 14:35	17 handling documentation that's used by consumer relations 14:39
18 Q. Why do you describe the changes as small? 14:35	18 would be relevant to this -- this consumer's lawsuits. 14:39
19 A. Well, I would describe it as small because 14:35	19 Those are probably the two that immediately come to 14:39
20 when you think about the fact that the documentation 14:35	20 mind. 14:39
21 covers, you know, potentially everything our agents and 14:35	21 Q. I'm a little bit confused by your last answer. 14:39
22 operators can do, the changes that we've made refer to 14:35	22 You said that what we're talking about now, the subject 14:39
23 very discreet activities or practices and don't really 14:35	23 selection, is not a manual? I thought that you gave me 14:39
24 affect the core processes and policies that we have. 14:36	24 this in response to my question that asked you to 14:39
25 Q. The online dispute automation business 14:36	25 identify which manuals -- 14:40
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1	MR. BROWN: Object to form. 14:40	1	14:43
2	BY MR. CENTO: 14:40	2	14:43
3	Q. (Continuing) -- were given to outside counsel, 14:40	3	14:43
4	so I'm really confused by what you mean when you say the 14:40	4	14:43
5	subject selection is not a manual? 14:40	5	14:43
6	MR. BROWN: Object to form, object as 14:40	6	14:43
7	argumentative and object as not accurately 14:40	7	14:43
8	characterizing the witness' earlier testimony. 14:40	8	14:43
9	BY MR. CENTO: 14:40	9	14:44
10	Q. Go ahead. 14:40	10	14:44
11	A. So Trans Union generally doesn't use the term 14:40	11	14:44
12	"manual," but as I understand manual, it refers to a 14:40	12	14:44
13	group of documents that are used to either describe 14:40	13	14:44
14	processes or describe practices or describe systems. So 14:40	14	14:44
15	although we don't use the term "manual," I think the 14:40	15	14:44
16	subject selection documentation, which is a compilation 14:40	16	14:44
17	of all of the business rules that Trans Union has in its 14:40	17	14:44
18	proprietary algorithms, I would view that as something 14:40	18	14:44
19	you could classify as a manual even know it's not in 14:40	19	14:44
20	a -- in a binder on a shelf somewhere. 14:41	20	14:44
21	Q. All right. With respect to those manuals, 14:41	21	14:44
22	which you said was relevant to this case under the 14:41	22	14:44
23	subject -- subject selection, that were provided to 14:41	23	14:44
24	outside counsel prior to 2005, has any of those changed? 14:41	24	14:44
25	A. I haven't reviewed the specific subject 14:41	25	14:44
	Page 50		Page 52
1	selection rules that would have been applicable to 14:41	1	14:45
2	Mr. Watkins' credit file update, but my understanding is 14:41	2	14:45
3	that his credit report existed prior to 2005 in the 14:41	3	14:45
4	Trans Union system, so certainly subject selection rules 14:42	4	14:45
5	that existed prior to 2005 could be relevant to how his 14:42	5	14:45
6	credit file was built and how information was added to 14:42	6	14:45
7	his credit file. 14:42	7	14:45
8	I don't know which specific rules may have 14:42	8	14:45
9	caused information to appear on Mr. Watkins' credit file 14:42	9	14:45
10	that specifically are the subject of his disputes. So I 14:42	10	14:45
11	don't know whether those rules have -- have changed at 14:42	11	14:45
12	all since 2005. 14:42	12	14:46
13	Q. But you think that rules regarding subject 14:42	13	14:46
14	selection from -- prior to 2005 would be relevant to 14:42	14	14:46
15	this case? 14:42	15	14:46
16	A. Absolutely. 14:42	16	14:46
17	Q. How so? 14:42	17	14:46
18	A. Trans Union's core subject selection rules 14:42	18	14:46
19	were built prior to 2005 and the changes that have been 14:43	19	14:46
20	made to those rules since 2005, again, tend to be very 14:43	20	14:46
21	incremental changes designed to address specific 14:43	21	14:46
22	situations that Trans Union has seen over the years. 14:43	22	14:46
23	14:43	23	14:46
24	REDACTED 14:43	24	14:46
25	14:43	25	14:46
	Page 51		Page 53

REDACTED**REDACTED****REDACTED**

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<p>1 I gave my affidavit in Childress? 14:46 2 BY MR. CENTO: 14:46 3 Q. Yes. If you made your look back. 14:46 4 A. No, I didn't. 14:46 5 Q. Okay. You also told me about some policies 14:47 6 and procedures that relate to FCRA regarding reasonable 14:47 7 procedures put into that broader category of the 14:47 8 hundreds of compliance policies that you mentioned. 14:47 9 Were those policies that you were talking about there 14:47 10 given to outside counsel prior to 2005? 14:47 11 A. I would categorize a number of our compliance 14:47 12 policies as aimed as maintaining reasonable procedures 14:47 13 to maintain maximum possible accuracy. For example, 14:47 14 data furnisher credentialing and onboarding, and I know 14:47 15 that those have been reviewed and relevant in litigation 14:47 16 with outside counsel and I'm -- I'm pretty confident 14:47 17 they were reviewed with defense counsel prior to 2005. 14:48 18 That's one of our oldest policies, for example, so I 14:48 19 would imagine that it was probably reviewed with outside 14:48 20 counsel in the 1990s. 14:48 21 Q. And I'm sorry. What did you call that again? 14:48 22 The data furnisher what? 14:48 23 A. We have several policies that address data 14:48 24 furnisher onboarding to make sure we're getting quality 14:48 25 data from our data furnishers. 14:48</p>	Page 54	<p>1 policies and procedures aimed at those requirements have 14:50 2 been in place for probably more than 20 years. So 14:50 3 there's a core set of policies and procedures and 14:50 4 training documents that come into play in almost every 14:50 5 lawsuit we defend, and, you know, I don't want to 14:50 6 speculate, but I think that it's reasonable that some of 14:50 7 those will be relevant in this litigation. 14:50 8 Q. And of the ones that you're talking about, 14:50 9 this core set, have they changed since 2005? 14:50 10 A. To the extent that I spoke of previously where 14:50 11 there have been updates to reflect things such as the 14:50 12 CFPB replacing the Federal Trade Commission, those types 14:50 13 of changes have occurred, changes in -- I'm trying to 14:51 14 think. In the compliance policies and procedures, those 14:51 15 would probably be the -- the only changes that would 14:51 16 have occurred since 2005. 14:51 17 With respect to changes in some of the system 14:51 18 documentation or subject selection documentation, I 14:51 19 don't know yet whether any of those have changed because 14:51 20 I have not yet determined which of those would have been 14:51 21 relevant in -- in the case of this consumer and in terms 14:51 22 of the consumer relations documentation, there may have 14:51 23 been changes based on a new claim code, certainly 14:51 24 changes to reflect linking and imaging, but, again, a 14:51 25 large portion of those documents will be the same. 14:51</p>	Page 56
<p>1 Q. Would that policy -- will those policies be 14:48 2 relevant to any of the claims in this case. 14:48 3 MR. BROWN: Object to form, calls for 14:48 4 speculation, calls for a legal conclusion. 14:48 5 BY MR. CENTO: 14:48 6 Q. Go ahead. 14:48 7 A. I don't know if we've identified which 14:48 8 policies specifically will be relevant to the defense of 14:48 9 this litigation. I don't know that we flushed out all 14:48 10 of those details yet. 14:49 11 Q. Okay. As you sit here today, have you 14:49 12 identified any of these policies that you're talking 14:49 13 about, the data furnisher onboarding policies that 14:49 14 relate to any client in this case? 14:49 15 MR. BROWN: Object to form, object that it 14:49 16 mischaracterizes the witness' earlier testimony. 14:49 17 THE WITNESS: I would -- I would say that the 14:49 18 defense of any consumer litigation will include 14:49 19 reference to a core set of policies and procedures. You 14:49 20 know, most of our lawsuits either allege that we failed 14:49 21 to have reasonable procedures to assure maximum possible 14:49 22 accuracy or -- I'm sorry and/or allege that we failed to 14:49 23 process the dispute in compliance with the requirements 14:49 24 of the Fair Credit Reporting Act, and those requirements 14:49 25 have been in the FCRA since I think the 1970s and our 14:49</p>	Page 55	<p>1 Q. These manuals that you've told us about today, 14:52 2 do any of them have as their subject the conduct of 14:52 3 litigation itself? In other words, how your outside 14:52 4 counsel should actually conduct the case in terms of 14:52 5 what they do in defending the case and strategies in 14:53 6 defending the case? Are there any manuals related to 14:53 7 that subject? 14:53 8 MR. BROWN: Object to form. 14:53 9 THE WITNESS: I think there are some documents 14:53 10 in the consumer relations documentation that talk about 14:53 11 working with outside counsel in defending litigation and 14:53 12 indicate which -- which departments are supposed to 14:53 13 interface with outside counsel or prepare summaries for 14:53 14 outside counsel to use in litigation defense and what 14:53 15 goes into that process. I don't know that they're 14:53 16 specifically directing outside counsel what to do, but 14:53 17 our outside counsel are familiar with those documents 14:53 18 and know which of our employees to go to and what to ask 14:54 19 for when they need something. 14:54 20 Q. Any others? 14:54 21 A. I can't think of anything at the moment. 14:54 22 MR. CENTO: Can we take a five-minute break? 14:54 23 MR. BROWN: Sure. 14:54 24 THE VIDEOGRAPHER: We are going off the 14:54 25 record. The time is 2:52 p.m. 15:02</p>	Page 57

1	(Whereupon there was a brief	15:02	1	change, as I'm sitting here right now. I would need to	15:06
2	break, after which the	15:02	2	review the documents and -- and determine whether they	15:06
3	following proceedings were	15:02	3	changed.	15:06
4	had:)	15:02	4	BY MR. CENTO:	15:06
5	THE VIDEOGRAPHER: We are back on the record.	15:02	5	Q. Have -- have -- and you haven't conducted a	15:06
6	The time is 3:00 p.m. Please, proceed.	15:02	6	review like that to determine whether those documents	15:06
7	BY MR. CENTO:	15:02	7	have changed?	15:06
8	Q. Are there any general written instructions or	15:02	8	A. The documents that would be relevant to our	15:06
9	manuals that were given to outside counsel as part of	15:02	9	compliance with 1681e?	15:06
10	their duties in defending litigation that was given to	15:02	10	Q. EB?	15:06
11	outside counsel that you haven't told me about?	15:03	11	A. Sorry. EB. I have not conducted a review of	15:06
12	A. I don't know whether you would consider	15:03	12	those in anticipation of this deposition, no.	15:06
13	billing requirements or billing practices that we would	15:03	13	Q. Have you conducted a review of them in --	15:06
14	provide to outside counsel. That's the only other thing	15:03	14	prior to giving your affidavit in either the Childress	15:06
15	I can think of.	15:03	15	or the Hobson case?	15:06
16	Q. Does Trans Union intend to raise as a defense	15:03	16	A. I reviewed virtually every change to the	15:07
17	in this case changes in the law that arise out of the	15:03	17	documentation that's occurred. It's part of my job at	15:07
18	2010 amendments to 15 U.S.C 1681a?	15:03	18	Trans Union. I've either reviewed it or someone on my	15:07
19	A. I'm sorry. Can I have that question again.	15:03	19	staff has reviewed it, but I did not review it	15:07
20		15:03	20	specifically in connection with preparing the	15:07
21		15:04	21	affidavits, no.	15:07
22	REDACTED	15:04	22	Q. Did you review that documentation and the	15:07
23		15:04	23	changes in the documentation as it relates to -- as they	15:07
24		15:04	24	relate to the standards -- the federal laws under	15:07
25		15:04	25	1681i of the Fair Credit Reporting Act --	15:07
		Page 58			Page 60
1	REDACTED	15:04	1	MR. BROWN: Object to form.	15:07
2		15:04	2	BY MR. CENTO:	15:07
3			3	Q. -- prior -- prior to today's deposition?	15:07
4	Q. Of the manuals -- of the manuals that you've	15:04	4	MR. BROWN: Same objection.	15:07
5	told me about today that were given to outside counsel	15:04	5	THE WITNESS: I would give the same answer. I	15:07
6	prior to 2005 and that have been changed since, were any	15:04	6	reviewed the changes and often authored the changes to	15:07
7	7 of those changes made because of things that happened in	15:04	7	those documents, but I did not do it specifically in	15:07
8	8 the litigation? In other words, rulings from -- from	15:04	8	preparing for this deposition or in preparing to execute	15:07
9	9 the Court about certain issues in the cases, rulings by	15:04	9	9 the affidavits.	15:08
10	10 Court regarding the standards under 1681e or 1681i or	15:05	10	Again, the -- the core documents are the same,	15:08
11	11 changes like that made to those manuals?	15:05	11	so if there were a specific policy change that would be	15:08
12	12 MR. BROWN: Object to form.	15:05	12	relevant to one of these cases, I would probably know,	15:08
13	13 THE WITNESS: I would say yes. There have	15:05	13	but I haven't specifically checked on that.	15:08
14	14 been changes made as a result of litigation against	15:05	14	MR. CENTO: Those are all of the questions I	15:08
15	15 Trans Union or decisions issued in litigation against	15:05	15	have.	15:08
16	16 other consumer reporting agencies, but I can't say	15:05	16	MR. BROWN: Okay. I don't have any questions.	15:08
17	17 whether or not those are specifically changes relating	15:05	17	THE VIDEOGRAPHER: That concludes this	15:08
18	18 to litigation of the sections of the law that you	15:05	18	deposition and is the end of media number one. We are	15:08
19	19 mentioned.	15:05	19	going off the record. The time is 3:06 p.m.	15:08
20	20 Q. Okay. So as you sit here today, you can't	15:05	20	(Whereupon a discussion was off	15:08
21	21 think of any changes made to any of the manuals we've	15:05	21	the video record.)	15:08
22	22 been discussing today that relate to, for example, the	15:05	22	MR. BROWN: We will reserve.	15:08
23	23 standard under 1681eb?	15:05	23	(Whereupon the deposition	15:09
24	24 MR. BROWN: Object to form.	15:06	24	concluded at 3:06 p.m.)	15:09
25	25 THE WITNESS: No, I can't think of a specific	15:06	25		
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[& - answer]

& & 2:6 31:17,17 0 084-004282 64:14 1 1 3:1 62:12 10 3:10 11 3:11 4:10 47:14 11th 1:17 20:2 62:11 63:8 12 3:12 13 3:13 135 20:1 14 1:6 3:14 4:17 14th 23:1 15 3:15 58:18,22 16 3:16 1681a 58:18,22 1681e 59:10 60:9 1681eb 59:23 1681i 59:10 60:25 17 3:17 18 3:18 19 3:19 1970s 55:25 1990 39:20 1990s 54:20 1:00 4:10 1:02 1:16 1:17 15:24 1:29 16:5 1:34 19:18 1:45 20:3 25:8 1:47 26:15 1:56 26:21 2 2 1:6 3:1 20 3:20 31:9 56:2 2000 34:7 39:23 2000x 21:16 2000y 21:16 2002-2003 27:6	2005 21:10 31:19 33:16,24 34:3,8,21 35:3,6,23,24 39:17 45:11,13,22 46:5,11 46:18 48:2,7,10,24 50:24 51:3,5,12,14 51:19,20 52:15 53:7 54:10,17 56:9,16 59:6 2007 9:25 2010 37:19,21 58:18 58:22,23 2011 37:20,22 2012 37:25 2013 45:4,7 2015 1:17 4:10 62:11 63:9 64:11 21 3:21 22 3:22 23 3:23 24 3:24 25 3:25 27th 64:10 280 2:4 2:14 20:1 2:52 57:25 3 3 3:2 30 63:23 64:1 317 2:8,9 32 20:7 334 2:3 35 1:6 4:17 363-2257 2:9 363-2400 2:8 3:00 58:6 3:06 61:19,24 4 4 3:2 434-6430 24:11 4545 2:7 46077 2:8 46204 2:3	5 5 3:3 555 1:15 4:12 6 6 3:5 47:14,15,15 60661 4:12 67 62:12 7 7 3:6 765 2:4 8 8 3:8 812 24:11 9 9 3:9 a a.d. 1:17 63:8 64:11 able 24:5 44:4,12 52:24 absolutely 49:4 51:16 access 40:14 accessing 43:13 account 47:8,10,12 accuracy 30:13 41:8 54:13 55:22 accurate 63:18 accurately 50:7 act 17:22 18:12,23 27:5,5 30:4,7,12 35:11 41:6,18,23 55:24 58:25 60:25 activities 11:12,23 12:21 13:17,21 20:15 32:17 47:23 activity 12:1,12,23 13:1,4 18:22 acts 32:10 actual 10:3 44:11 adams 1:16 4:12 add 44:12 51:23,25	added 28:23 36:7,16 37:8 43:9 47:4 51:6 52:16 additional 52:13 address 51:21 52:8 52:14 54:23 advisable 18:22 advancement 23:9 affect 47:24 affidavit 53:21 54:1 60:14 affidavits 5:19 60:21 61:9 aforesaid 62:10,12 age 47:10 agencies 43:23 59:16 agent 28:7 35:16 47:3 agents 35:15 44:16 44:17 47:21 ago 8:17 52:8 agree 4:7 52:18 agreed 15:22 agreement 63:22 ahead 11:15 14:5 16:14 23:6 29:13 32:22 40:7 50:10 52:22 53:15 55:6 aided 63:12 aimed 18:21 54:12 56:1 algorithms 50:18 allege 55:20,22 allow 22:10 27:1 allows 43:22 amendments 21:17 27:5 58:18,22,23,24 annual 38:17 answer 7:1,15 10:13 12:7 15:6,8 17:1,3 18:7 20:21 21:19,19 21:20 23:7 24:25,25 27:2,17 29:21 49:21 53:23 61:5
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[answered - certain]

answered 22:11	authorized 7:4,7	broader 54:7	case 4:14,15,17 7:4
answers 63:19	automatically 47:11	brought 6:8 39:9	7:19,24 8:23 9:1,2
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